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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

VISION INDUSTRIES GROUP, INC.,

Plaintiff,

Case No. 2:18-cv-6296 (ES) (CLW)

-- against --

ACU PLASMOLD, INC., ABC
COMPANIES 1-10 and XYZ
CORPORATIONS 1-10,

Defendants

**DEFENDANT ACU PLASMOLD, INC.,
MOTION TO STRIKE EXPERT
DECLARATIONS OF MARK
LANTERMAN, EXCLUDE
LANTERMAN'S TESTIMONY, VACATE
MAGISTRATE JUDGE CATHY
WALDOR ORDER FOR SANCTIONS
(Doc 266), AND TO DISMISS WITH
PREJUDICE THE REMAINING ISSUES
ON PLAINTIFF'S MOTIONS FOR
SANCTIONS (Doc 104; 124; 224).**

Pursuant to Federal Rule of Civil Procedure 26 and Federal Rule of, evidence 702,
defendant ACU Plasma old, Inc. move for an order as follows:

1. Striking the Expert Declarations of Mark Lanterman (Doc 146-2; 156-1; 229-1; 259-1; 301 and 301-1), letters, emails, statements or other material that appears in the docket from Mr. Lanterman;
2. Excluding the testimony of Mr. Lanterman in this matter;
3. Vacating Magistrate Judge Cathy Waldor Order for Sanctions (doc 266); and
4. Dismissing with prejudice the remaining issues on Plaintiff's Motions for Sanctions (Doc 104; 124; 224), and any other sanction issues remaining against Defendant.

Defendant's Motion is based upon the attached Memorandum of Law and the Declaration(s) of Counsel.

Dated: April 11, 2025

/s/ Michael T. Warshaw

/s/ Edward W. Miller